

REMARKS

In the Office Action, the Examiner rejected claims 1, 3-9, 11-15, and 70-79. Claims 16-27, 29-33, and 80-85 are currently withdrawn. Applicants hereby amend claims 16, 80, 82, and 83, cancel claim 84, and add new claim 86. In view of the foregoing amendments and the following remarks, Applicants respectfully request reconsideration and allowance of all pending claims.

Claim Rejections under 35 U.S.C. § 102

In the Office Action, the Examiner rejected claims 1, 3-5, 7-9, 11-12, 14, 70, and 74 under 35 U.S.C. § 102(b) as being anticipated by Renzacci (U.S. Patent No. 5,887,454, hereinafter "Renzacci"). Applicants respectfully traverse this rejection.

Legal Precedent and Guidelines

Anticipation under section 102 can be found only if a single reference shows exactly what is claimed. *Titanium Metals Corp. v. Banner*, 778 F.2d 775, 227 U.S.P.Q. 773 (Fed. Cir. 1985). For a prior art reference to anticipate under section 102, every element of the claimed invention must be identically shown in a single reference. *In re Bond*, 910 F.2d 831, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990). To maintain a proper rejection under section 102, a single reference must teach each and every limitation of the rejected claim. *Atlas Powder v. E.I. du Pont*, 750 F.2d 1569 (Fed. Cir. 1984). Accordingly, Applicants need only point to a single element not found in the cited reference to demonstrate that the cited reference fails to anticipate the claimed subject matter. The prior art reference also must show the *identical* invention "*in as complete detail as contained in the ... claim*" to support a *prima facie* case of anticipation. *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 U.S.P.Q. 2d 1913, 1920 (Fed. Cir. 1989).

The Renzacci reference is missing features recited by independent claim 1.

Turning to the claims, the present independent claim 1 recites, *inter alia*, “a drying mechanism pneumatically coupled to the laundry enclosure via an air inlet and an air outlet, comprising: a vapor compression cycle system comprising a condenser, an evaporator, and a compressor disposed in a closed fluid path, wherein the condenser is configured to heat air upstream of the air inlet; and wherein the evaporator is configured to cool air downstream of the air outlet.”

The Renzacci reference does not teach or suggest the foregoing claim features, e.g., both a condenser and an evaporator of a vapor compression cycle system configured to heat air and cool air, respectively. In the Office Action, the Examiner appears to interpret the condenser 26 as the claimed condenser and the cooling unit 7 as the claimed evaporator. *See* Office Action, page 3. However, the Examiner also stated “Renzacci teaches a heat exchanger 15 is installed in the drying air circuit downstream from preheating unit 19 (supplemental heating device) and cooling unit 7 (cooling device).” Office Action, page 3. The Examiner did not specifically address the “vapor compression cycle system” and the “closed fluid path” as recited in claim 1. Furthermore, the Examiner did not specifically address “the condenser is configured to heat air” and “the evaporator is configured to cool air” as recited in claim 1. As discussed below, these claim features are clearly missing from the Renzacci reference.

First, for sake of hypothetical argument, if the condenser 26 is interpreted as the claimed condenser and if the cooling unit 7 is interpreted as the claimed evaporator as suggested by the Examiner, then the Renzacci reference fails to teach or suggest these elements 7 and 26 as part of a vapor compression cycle system and a closed fluid path. As illustrated in FIG. 1, the Renzacci reference illustrates the cooling unit 7 as part of the drying air circulation system 4, whereas the condenser 26 is part of the solvent distillation system. The cooling unit 7 is simply not connected to a closed fluid path with the

condenser 26. In fact, the cooling unit 7 is not even disclosed as an evaporator, as suggested by the Examiner. As illustrated in FIG. 1 and disclosed by the Renzacci reference, the cooling unit 7 is not part of the solvent distillation system and, thus, cannot possibly be interpreted as part of a vapor compression cycle system. Furthermore, the condenser 26 of the Renzacci reference is completely isolated from the drying air circulation system 4, such that it cannot possibly be interpreted to heat air upstream from the air inlet, as recited by claim 1. For at least these reasons, among others, the Renzacci reference cannot anticipate independent claim 1 and its dependent claims.

Second, for sake of hypothetical argument, if the air pre-heating unit 19 is interpreted as the claimed condenser and if the cooling unit 7 is interpreted as the claimed evaporator, then the Renzacci reference fails to teach or suggest these elements 7 and 19 as part of a vapor compression cycle system and a closed fluid path. Again, the Renzacci reference does not teach or suggest any closed fluid path including these elements 7 and 19, much less a vapor compression cycle system with these elements 7 and 19. Furthermore, the Renzacci reference does not teach or suggest that the air pre-heating unit 19 could be an evaporator, nor does the Renzacci reference teach or suggest that the cooling unit 7 could be a condenser. These claim features are clearly missing from the Renzacci reference. For at least these reasons, among others, the Renzacci reference cannot anticipate independent claim 1 and its dependent claims.

In summary, despite various hypothetical interpretations of the Renzacci reference, the features recited above are clearly missing. Again, the Renzacci reference fails to teach or suggest "a drying mechanism pneumatically coupled to the laundry enclosure via an air inlet and an air outlet, comprising: a vapor compression cycle system comprising a condenser, an evaporator, and a compressor disposed in a closed fluid path, wherein the condenser is configured to heat air upstream of the air inlet; and wherein the evaporator is configured to cool air downstream of the air outlet."

In view of these deficiencies, among others, Applicants respectfully request withdrawal of the foregoing rejection under Section 102.

Claim Rejections under 35 U.S.C. § 103(a)

The Examiner rejected claims 13, 15, 71, and 75-79 under 35 U.S.C. § 103(a) as being unpatentable over Renzacci. The Examiner also rejected claims 6, 72, and 73 under 35 U.S.C. § 103(a) as being unpatentable over Renzacci as applied to claims above, and further in view of Berndt et al. (U.S. Patent No. 6,059,845, hereinafter "Berndt"). Applicants respectfully traverse these rejections. As discussed above, the Renzacci fails to teach or suggest various features recited by independent claim 1. Claims 13, 15, 71, and 75-79 depend from independent claim 1, and are believed to be allowable for at least the same reasons as discussed above with reference to claim 1. The Berndt reference does not obviate the deficiencies of the Renzacci reference. As a result, the cited references, taken alone or in hypothetical combination with one another, fail to teach or suggest the features recited in the present claims. According, Applicants respectfully request withdrawal of the foregoing rejections under Section 103.

Conclusion

Applicants respectfully submit that all pending claims should be in condition for allowance. However, if the Examiner believes certain amendments are necessary to clarify the present claims or if the Examiner wishes to resolve any other issues by way of a telephone conference, the Examiner is kindly invited to contact the undersigned attorney at the telephone number indicated below.

Respectfully submitted,

Date: March 14, 2008

/Tait R. Swanson/
Tait R. Swanson
Reg. No. 48,226
FLETCHER YODER
P.O. Box 692289
Houston, TX 77269-2289
(281) 970-4545